

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

ALVIN GREENBERG, MICHAEL  
STEINBERG, JULIE HANSON, CHRISTINA  
KING, and RONNELL ROBERTSON, on  
behalf of themselves and all others similarly  
situate,

Plaintiffs,

v.

AMAZON.COM, INC., a Delaware  
corporation,

Defendant.

Case No. 2:21-cv-00898-RSL

**JOINT STATUS REPORT AND  
STIPULATED MOTION**

***Note on motion calendar:***  
January 10, 2025

1. On October 4, 2024, the Court entered an Order Setting Trial Date and Related Dates. Dkt. 69. In that Order, the Court set a deadline for the parties to agree on custodians, search terms, and structured data, or to submit to the Court outstanding disputes on these issues. *Id.* at 1.

2. On December 4, 2024, Amazon filed a Motion for Protective Order on a primary area on which the Parties disagree as to the scope of discovery. Dkt. 78. That motion was noted for December 18, 2024.

3. On December 13, 2024, the Parties filed a Joint Status Report and Stipulated Motion informing the Court that the Parties had been “negotiating custodians, search terms, and structured data, and believe additional time may be useful in narrowing, and potentially resolving, outstanding disputes.” Dkt. No. 81. The Parties requested an extension to January 10, 2025, of the deadline for

1 agreement or presentation of disputes on search terms, custodians, and structured data. Dkt. 81. On  
2 December 18, 2024, the Court granted the Parties' stipulated motion. Dkt. 84. Also on December  
3 18, 2024, Amazon filed its Reply in support of its Motion for Protective Order. Dkt. 85.

4 4. The Parties have continued to actively negotiate custodians, search terms, and  
5 structured data parameters, and have made significant progress narrowing disputes. Due to the  
6 complexities involved however, including with respect to Amazon's data, the Parties believe that  
7 additional time to negotiate these matters is warranted and will help minimize, if not eliminate,  
8 disputes requiring judicial involvement.

9 5. The Parties accordingly jointly move to extend the deadline for agreement or  
10 presentation of disputes on search terms, custodians, and structured data as follows:

11 **January 24, 2025:** Deadline for agreement on custodians and search terms, or submission  
12 of any outstanding disputes.

13 **February 10, 2025:** Deadline for agreement on structured data to be produced, or  
14 submission of any outstanding disputes.

15 **April 11, 2025:** Deadline for production of structured data.

16 6. These deadlines contemplate that the Parties will make rolling productions of  
17 documents and data, as materials are ready for production.

18 7. The Parties do not anticipate the foregoing extensions to require additional changes  
19 to case deadlines.

20 IT IS SO STIPULATED.

21 DATED: January 10, 2025

Respectfully submitted,

22 /s/ Steve W. Berman

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6 *Attorneys for Plaintiffs and the Proposed Class*

7 DATED: January 10, 2025

Respectfully submitted,

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*Attorneys for Defendant Amazon.com, Inc.*

1 **[PROPOSED] ORDER**

2 The Court GRANTS the Parties' stipulated motion. The deadlines are extended as follows:

3 **January 24, 2025:** Deadline for agreement on custodians and search terms, or submission  
4 of any outstanding disputes.

5 **February 10, 2025:** Deadline for agreement on structured data to be produced, or  
6 submission of any outstanding disputes.

7 **April 11, 2025:** Deadline for production of structured data.  
8

9 SO ORDERED this \_\_\_\_ day of January, 2025.  
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12 Robert S. Lasnik  
13 United States District Judge  
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